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BY EMAIL

November 26, 2019

Ms. Christine E. Long
Board Secretary and Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto ON M4P 1E4
BoardSec@oeb.ca

Dear Ms. Long:

**Re: EPCOR Natural Gas Limited Partnership (ENGLP)
Application to amend the certificate of public convenience and necessity
for the Township of South-West Oxford
OEB Staff Interrogatories
OEB File Number: EB-2019-0232**

In accordance with Procedural Order No. 1, please find attached OEB staff's interrogatories to ENGLP for the above proceeding. This document has been sent to ENGLP and to all other registered parties to this proceeding.

ENGLP is reminded that its responses to the interrogatories are due by November 29, 2019.

Yours truly,

Original Signed By

Azalyn Manzano
Advisor, Natural Gas

Encl.



OEB Staff Interrogatories

**Application to amend the
certificate of public convenience and necessity for
the Township of South-West Oxford**

EPCOR Natural Gas Limited Partnership

EB-2019-0232

November 26, 2019

OEB Staff-1

Ref: Application cover letter; Application, pp. 5, 6 and 11; Appendix I; E.B.C. 111/119

Preamble:

ENGLP states that it is applying for an order amending ENGLP's certificate for the Township of South-West Oxford. ENGLP proposes that portions of its omnibus certificate covering the Township of South-West Oxford be superseded and replaced by a new certificate including the Village of Salford, as a step to completely "retiring" the omnibus certificate. ENGLP also states that the OEB is not precluded from amending the omnibus certificate to include Salford.

ENGLP included a draft certificate in Appendix I which includes the following lots and concessions in South-West Oxford representing the Village of Salford:

- Concession 1: the southwest quarter of Lot 13 and the south half of Lot 14; and
- Concession 2: the northwest quarter of Lot 13 and the north half of Lot 14.

ENGLP also previously sought direction from the OEB regarding the remaining portions of the omnibus CPCN including whether to seek new certificates for municipalities not affected by the OEB's determination in EB-2017-0108, specifically, the Town of Aylmer and certain portions of the Township of South-West Oxford and the Township of Westminster (now part of the City of London).

Questions:

- a) Please confirm that the draft certificate includes only the exact same areas as specified for the Township of Southwest Oxford in ENGLP's current omnibus certificate and the additional lots listed above.
- b) Please state whether ENGLP prefers that the OEB issue a new certificate cancelling and superseding ENGLP's current omnibus certificate in relation to the Township of South-West Oxford, as opposed to amending the omnibus certificate. In either case, please provide the rationale.
- c) If ENGLP prefers a new certificate, can ENGLP advise if it anticipates doing the same with regard to the Town of Aylmer and the City of London? If so, please outline when ENGLP would anticipate filing these applications.

OEB Staff-2

Ref: Application, pp. 8 and 10; Appendix A; Appendix H

Preamble:

ENGLP states that a volumetric throughput of 68,000 m³/year will enter the expanded system at Salford Road and Dereham Line. ENGLP forecasts a 60% conversion rate for the purposes of computing the required capital contribution. Appendix H identifies 74 houses and 5 commercial buildings in the area, for a total of 79 potential attachments. Appendix A mentions that a manufacturing company in Salford (The Salford Group) is also looking to connect to the natural gas distribution system.

Assuming an annual volumetric consumption of 1,780 m³ per customer, 68,000 m³/year would equate to adding 38 customers, which is below the 60% forecast conversion rate for the area.

Questions:

- a) Does the 68,000 m³/year volumetric forecast include service to The Salford Group? If not, please provide the annual forecast volume for this potential customer.
- b) Please identify what actions ENGLP might take if the forecast attachments falls below the 60% forecast attachment rate to prevent cross-subsidization of this project by existing customers.

OEB Staff-3

Ref: Application, p. 10

Preamble:

ENGLP states that any capital contribution would be limited to portions of service pipeline exceeding 20 metres in length from the planned distribution mains.

Question:

- a) Please provide if known, or otherwise estimate, the number of customers who would require a service main in excess of 20 metres (i.e. who would then be required to provide a capital contribution). Please provide if known, or otherwise estimate, the average amount that these customers would be required to pay as a capital contribution.

OEB Staff-4

Ref: Application, pp. 1 and 12

Preamble:

ENGLP's current certificate for the Township of South-West Oxford does not include the area of the Village of Salford. However, ENGLP believes that it can economically extend its nearby natural gas distribution infrastructure to Salford, as its infrastructure is "essentially on the doorstep" of Salford.

Question:

- a) Please elaborate and provide context on how the OEB's decision in this application will influence ENGLP's utilization of existing investments and decisions to pursue similar long-term investment.